US ecology

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April 26, 2019

Ms. Natalie Creed
Hazardous Waste Bureau Chief
Waste Management and Remediation Division
Idaho Department of Environmental Quality (IDEQ)
1410 North Hilton
Boise ID, 83706-1255

RE: US Ecology Idaho, Inc. (USEI) – IDD073114654
Permit Condition I.V. and II.U.1.– 2019 First Quarter Discrepancy Report

Dear Ms. Creed:

There were several minor discrepancies or items not requiring 24-hour reporting as outlined in Permit Condition I.V. and II.U.1. that occurred during the first quarter of 2019.

USEI is required to perform inspections and maintain records in accordance with Permit Conditions II.E., V.A.7., VIII.A.2, and I.AA. and Attachment 4 of USEI's RCRA Part B Permit. USEI previously detailed missing inspection records in the 2018 Fourth Quarter Discrepancy Report and stated that the Department would be notified upon recovery of records.

The following is a list of records recovered:

- Figure F-5 for November 14th -15th
- Figure F-6 for November 15th

The following is a list of inspections missing from USEI's operating record:

- Figures F-1, F-3, F-4e, F-4f, F-4g, F-4h, F-4i, F-5, F-6, and F-7 for November 16th - 17th
- Figures F-19, F-20, F-21, and F-22 for November 15th – 17th
- F-12 for November 14th – 17th
- Figures F-2, F-2a, F-4, F-4d, F-4j, F-8, F-9, and F-15 for November 12th – November 17th
- Figure F-11 and Figure F-24 for November 1st – 17th

Table F-1, USEI's Inspection Schedule, has been included for your reference.

In accordance with Permit Condition XI.A.1., and Attachments 4, 14, and 24 of USEI's RCRA Part B Permit, USEI is required to remove spilled or leaked wastes and accumulated liquid from the secondary containment systems of the Containment Building within 24-hours of discovery. USEI personnel began the process of removing containers of waste from the debris side of the Containment Building on April 15, 2019. It was noted that the sumps on the debris side were covered by an I-beam and could not be accessed. The sumps in the

stabilization side of the building are also inaccessible at this time. As such, the LCR/LDCR systems of the Containment Building have not been inspected since the November 17, 2018 incident and any potential liquids have not been removed. USEI personnel have been removing rainwater accumulation from collection trenches in front of the Containment Building as needed.

There were no other discrepancies noted during the first quarter at USEI.

As discussed with your staff, manifest discrepancies are not included in this report as per the reporting requirements mandated under IDAPA 58.01.05.008, and 58.01.05.012 [40 CFR §§ 264.71, 264.72, and §270.30(l)(7)].

If you have any questions or comments, please feel free to contact me or Rebecca Hogaboam at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,

Jason Evens
General Manager

cc: Barbara McCullough– EPA Region 10
Garrett Bright – IDEQ

Enclosure

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
Container Management Units	Spills, equipment, structural integrity of containers	Normal Working Day (Fig. F-1, F-5, F-6, F-7, F-19, F-20, F-21, F-22
Waste Water Tank Systems	Spills, structural integrity, volumes	Daily (Fig. F-2)
Waste Water Storage Tanks - Wall Thickness	Corrosion, erosion, delamination, disintegration Ultrasonic Thickness Tests	Every 3 years
Mix Bin Tanks MBT-1,2, 3, 4 (Inside Containment Building)	Secondary Leak detection system, volume of liquid removed, structural integrity, spills	Normal Working Day[1,2] (Fig. F-2a)
Mix Bin Tanks MBT-1, 2, 3, 4 (Inside Containment Building)	Structural Integrity	Every 3 years
Surface Impoundments	Liquids in leak detection system	Normal Working Day[1,2] (Fig. F-3) and after 1/2" in a 24-hour storm
Landfill Areas	Integrity, cover, liner, accessibility, safety, dust, collected water, excess liquids in primary leachate collection/secondary leachate detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4, F-4d, and F-4j) Monthly and after 1/2" in a 24-hour storm (Figs. F4a, b, and c)
	Primary leak detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4e,f,g, and h) Daily (Fig. F-4i)
	Secondary leak detection systems	Normal Working Day[1,2] (Figs. F-4e,f,g, h, and i)
Stabilization Facility	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck processing and waste handling/storage areas. b.) Integrity of containment ramps c.) Liquids in containment areas	Normal Working Day[1,2] (Fig. F-5)
Containment Building (Debris portion)	Spills, accessibility, equipment, structural and container integrity, dust	At Least Weekly(Fig. F-6)
	emissions, liquids in LDCRS	
	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck	Normal Working Day[1,2] (Fig. F-6)

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	processing and waste handling/storage areas. b.) Integrity of containment ramps, overhead doors, entry-ways and exits. c.) Liquids in collection trenches, grating over collection trenches intact; remove and manage any pumpable liquids in accordance with Permit Condition II.E and the WAP, check integrity of grating over collection trenches. d.) Process equipment; inspect size reduction system and process equipment to ensure that inlets and screens free of tramp materials, grates secured, belt guards in place. e.) Liquids in LCRS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids, remove and manage any pumpable liquids. f.) Inspect the steel bin(s) for tears or cracks	
	a.) Annual inspection and maintenance of mixing bin(s)	Annual
Crusher System	a.)Obstructions, Spills, housekeeping, guards in place, structural integrity of feed conveyor b.)Guards, oil levels proper, spills, housekeeping, structural integrity c.)Air compressor, pressure drop indicator, bag house operational d.)Emergency stop, and sirens operational e.)Housekeeping, spills in loading area	Daily when in use Normal Working Day[1,2] (Fig. 6a)
Containment Building (Stabilization portion)	a.) Inspect Dust Collection System for equipment integrity and function b.) Inspect liquids in LCS and LDCRS collection system integrity.	At Least Weekly (Fig. F-7)
	c.) Spills, accessibility, housekeeping; inspect the entry ways/exits for	Daily when in use Normal Working Day[1,2]

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	accessibility, check for spills in truck processing and waste handling/storage areas. b.) Integrity of containment ramps. c.) Liquids in containment areas. d.) Liquids in LCS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids. e.) Operation of APC equipment. f.) Inspect the visible concrete wear surface associated with the primary liner for cracks, gaps, corrosion, or deterioration. g.) Inspect the steel wear plates for tears or cracks.	(Fig. F-7)
	a.) Annual inspection and maintenance of the mixing bins. b.) Inspect bottom steel wear plates for distortion and exposure of supporting media.	Annual
HEPA Filter at Containment Building	Filter integrity	Annual
Vehicle Wash	Sumps leaking/full, controls/valves not working, equipment damaged, drainage inadequate	Normal Working Day[1,2] (Fig. F-8)
Roads, Drainage, Run-on/run-off	Malfunction, blockage, integrity spillage	Weekly and after 1/2" in a 24-hour storm (Fig. F-9)
Gates/Fence	Functional, damage, deterioration	Monthly (Fig. F-10)
Yard and Truck Scale Areas	Spills, mechanical or electrical failure, damage, or deterioration	Normal Working Day[1,2] (Fig. F-11)
Staging/Unloading/Loading Areas	Accessibility, spills, integrity	Normal Working Day[1,2] (Figs. F-12, F-19, F-20, F-21, F-22)
Monitoring Wells	Unlocked, tampering	Monthly (Fig. F-13)
Contingency Plan – Response Equipment (radios, etc.)	Functional	Monthly (Fig. F-14)
Past Practice Units	Integrity	Weekly (Fig. F-15)
Past Practice Carbon Units	Carbon System Integrity	Monthly (Fig. F-18)
Leachate Treatment and Piping System	Pipe and support system integrity, system non-operational, spillage	Normal Working Day[1,2] (Fig. F-24)

[1] Performed only for those equipment/areas in use during the day of the inspection.

[2] A Normal Working Day is defined as any scheduled working day (excluding weekends and holidays) where waste management activities occur at the facility.